

Exhibit A to proposed  
#449  
amended complaint

TWENTY-FOURTH JUDICIAL DISTRICT COURT  
PARISH OF JEFFERSON  
STATE OF LOUISIANA

CASE NO.

736-680

DIVISION: "

CHRIS E. YOUNT

VERSUS

DOUGLAS K. HANDSHOE, SLABBED.ORG  
SLABBED NEW MEDIA, LLC. & JACK E. "BOBBY" TRUITT

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JACK E. TRUITT  
PARISH OF JEFFERSON, LA

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PETITION FOR INJUNCTIVE RELIEF  
AND DAMAGES FILED UNDER SEAL

1.

Plaintiff Chris Yount personally and on behalf of the minor child over whom he is sole  
/domiciliary parent, who are residents of Jefferson Parish, Louisiana, aver the following facts.

2.

Jurisdiction and venue vests in these Courts as the actions involved occurred in these Courts and  
as the damages occurred in the Parish of Jefferson, State of Louisiana. As well venue vests as the  
Jefferson Parish District Attorney's office has taken over aspects of the custody proceedings.

3.

Defendant Douglas K. Handshoe is a resident of Bay St. Louis, Mississippi. He publishes an  
Internet web site know as the Slabbed blog /aka/ Slabbed New Media, LLC. which targets  
Louisiana as one of its primary audiences.

4.

Defendant Slabbed.org / Slabbed New Media, LLC is INTERNET WEBSITE which is used by  
Handshoe, Truitt, and others to cyber-stalk and defame private persons as well as public officials.

5.

Defendant Jack E. Truitt is a resident of Covington, Louisiana, and frequently contributes to the  
Slabbed blog. Truitt is a Louisiana attorney and is the attorney for Slabbed.org and Handshoe and  
has publically stated his financial support of Handshoe and Slabbed.org.

6.

Defendants have falsely and publicly accused [online] Plaintiff of sodomy involving his son.

7.

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In the alternative, Defendants created the false innuendo that Plaintiff sodomized his son.

8.

In so doing, Defendants have also violated Louisiana law protecting the identity of minors, and used 24th Judicial District documents to injure not only the Plaintiff but also his son.

9.

Defendants have committed two acts of defamation on the Slabbed blog, a cause of action for defamation that arise out of a violation of Louisiana Civil Code article 2315. Such a violation constitutes a breach of duty, or fault, and may be actionable under C.C. 2315, which provides that "[e]very act whatever of man that causes damage to another obliges him by whose fault it happened to repair it."

10.

Defendants have also intentionally inflicted emotional distress on the Plaintiff.

11.

Plaintiff is involved in a divorce proceeding in the 24th judicial district of Louisiana.

12.

Defendant Handshoe filed a frivolous and vexatious lawsuit against Plaintiff, his attorney Daniel Abel, and others in Hancock County, Mississippi, and is using the Internet publications particularized herein to extra-judicially settle scores with the Plaintiff.

13.

Defendant Handshoe has stated that the Slabbed blog has 1 million unique visitors annually.

14.

On February 13, 2014, Defendant Handshoe and Defendant Truitt conspired to publish, and did actually publish a drawing authored by Plaintiff's son that was filed by the mother Tami Steitle in Plaintiff's divorce proceeding.

15.

The drawing, as published, is noticed as Exhibit A—and shall be provided to the Court underseal at the Court's request.

16.

The drawing was published on a Slabbed web site page entitled "Very disturbing child welfare issues raised in 24th JDC case."

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17.

Defendants published that "the child has been failed by the justice system," implying that a judicial decision to leave Plaintiff's child in the custody of his father was done in error because Plaintiff was sexually molesting his child.

18.

Defendants published a caption beneath the drawing: "A picture drawn by a minor (male) of acts of sodomy contained in a 24th JDC case. Name withheld to protect the minor."

19.

Despite falsely pretending to protect the name of Plaintiff's minor son, Defendants conspired to reveal the identity of the Plaintiff's minor son and the Plaintiff's identity.

20.

Defendant Truitt entered the comments section of the web page. The Defendants published the following under Truitt's name: "Are you able to tell me which case this came from?"

21.

Defendants then published: "Yount v Steitle," making clear the the minor involved was Plaintiff's son and that the instance of alleged failure in the judicial system was the during Plaintiff's divorce proceedings.

22.

On February 18, 2014, Defendant's web site, the Slabbed blog, was subsequently taken down by Defendant Handshoe's service provider due to a violation of that web host's terms of service by Handshoe, including infringing the copyright of third parties.

23.

On the same day, Handshoe found a new web host and started publishing the Slabbed blog anew.

24.

On February 21, 2014, Defendants published the drawing contained in Exhibit A again on the Slabbed blog. In published text on the web page linking to that published drawing, Defendants published "But Abel shows up most in Yount v Steitle where he is representing his in-house troll Chris Yount in a hotly contested divorce."

25.

Defendants further published: "But that case gets better because Judge Ray Steib recused himself

after a disturbing picture drawn by Yount's minor child prompted an outside intervention."

26.

Defendants further published: "And of course the picture drawn by the child imparts the reason why this became such an important matter. To the extent my own Mother was a recognized special needs director for three K-12 school districts here in Mississippi, I know enough to know there is some serious human psychology at play thus the "important matter" part."

27.

Defendant republished the drawing contained in Exhibit A at the URL: <http://slabbed.org/wp-content/uploads/2014/02/divorce-imaged-1-23-14.jpg>.

28.

In this instance of publication, Defendants did not pretend they were not identifying the Plaintiff and his minor son.

29.

Defendants falsely published the implication that an "outside intervention" regarding the Plaintiff's sexual molestation of his son caused the relevant judge to rescue himself. This is false. The defamatory innuendo published by the Defendants was compounded by referring to the Plaintiff as his attorney's "in-house troll." Plaintiff works for a law firm but not for Abel.

30.

Defendant Handshoe's statement that the judge's recusal had to do with the drawing in Exhibit A is false and defamatory.

31.

Defendant Handshoe's statement that he has some imparted expertise in human psychology, and the Plaintiffs is therefore molesting his son is false and defamatory.

32.

When read in the context of previous publications about the Plaintiff on the Slabbed blog, the false and injurious innuendo regarding sodomy is made even more explicit and injurious to Slabbed's audience.

33.

Defendants Truitt and Handshoe published statements about Chris Yount are false and unprivileged, reaching a broad audience through the powerful medium of an established web site.

Defendants publications were at a minimum negligent, and were in fact intentional and malicious and sociopathic. Both Plaintiff Chris Yount and his son have been injured as a result.

34.

In particular, Defendants' publication are defamatory per se, and accuse Plaintiff of criminal and morally reprehensible conduct involving his minor son.

35.

After Defendants' initial publications in February, 2014, the Court sealed parts of the court record, including the minor child's drawing. At the order of the Court, attorney Abel took action to have the drawing removed from publication by sending notice to the Defendants' web host, including a notice of copyright infringement regarding publishing the drawing without permission. A copy of the Court Order was given to Handshoe by the web host.

36.

The drawing was temporarily removed from the web site. However, on or around March 19, 2014, the Defendants republished the drawing juxtaposed with defamatory words about the plaintiff with full knowledge that the drawing was sealed by Court Order.

#### INJUNCTIVE RELIEF

37.

Defendants Handshoe, Truitt, and Slabbed.org actions violate both federal and state laws, constitute cyber-stalking, and defamation—such that the Court should set a hearing immediately and enjoin each and all of the defendants from all such criminal acts and violations. Petitioner moves the Court for such hearing at its earliest convenience.

38.

Since defendants actions involved matters in these Courts the Court should order all defendants to appear for the hearing to be set as to the injunctive relief requested. If defendants do not appear the Court should issue its order as Handshoe, Truitt, and Slabbed.org continue to publish the drawing and commentary accusing Petitioner of the crimes involving his minor child online.

#### DAMAGES

39.

The statements and allegations made by Defendants Handshoe, Truitt, and posted on Slabbed.org online and circulated in Jefferson Parish and world-wide are lies—and are accusations of crimes

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which are defamatory per se.

40.


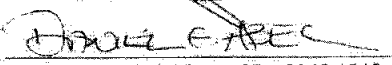
Petitioner is entitled to all damages which arise from Defendants' cyber-stalking and defamation as well as from all other causes of actions which are evidenced between now and the trial of this matter. These damages include mental anguish as well as other damage under Louisiana law.

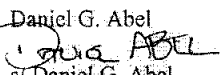
PRAYER

Petitioner Chris Yount individually and on behalf of his minor son, prays that this petition be served upon defendants and after due process had, an injunctive order be issued against Defendants Handshoe, Truitt, and Slabbed.org and that judgment be issued in petitioners favor against defendants and defendants assessed all costs, attorney fees and damages proved to the Court.

Verification

I have personally provided the facts set forth in the pleading and verify their accuracy and truthfulness and personally have seen the false statements and false accusations made against me and my son—all of which are false. I have verified these facts on 20 March 2014 before counsel.

  
Chris B. Yount  
  
Daniel G. Abel, Notary No. 8348 / Life

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s/ Daniel G. Abel  
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Prepare for Long-Arm Service

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